

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	No. 15-CV-2202
	:	
ONE (1) PALMETTO STATE ARMORY	:	
PA-15 MACHINEGUN RECEIVER/FRAME	:	
UNKNOWN CALIBER, SERIAL NUMBER	:	
LW001804,	:	
	:	
Defendant, and	:	
	:	
WATSON FAMILY GUN TRUST	:	
	:	
Claimant.	:	
	:	

**VERIFIED CLAIM OF INTEREST BY
THE WATSON FAMILY GUN TRUST**

Pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, Claimant, the Watson Family Gun Trust, by and through its trustee, Ryan S. Watson, and counsel, David Scott, Esq., hereby files this verified claim and asserts its interest in the Defendant property and in support thereof avers as follows:

1. Ryan S. Watson, as an individual, purchased the Defendant property, a Palmetto State Armory PA-15 lower receiver bearing serial number LW001804 from Palmetto State Armory.

2. Ryan S. Watson is the settlor and trustee of the Watson Family Gun Trust lawfully organized and existing under the laws of the Commonwealth of Pennsylvania, and as such,

lawfully transferred the above named property bearing serial number LW001804 to the Watson Family Gun Trust.

3. Thereinafter, pursuant to the full written legal authorization of the United States Government, namely an Application to Make and Register a Firearm duly submitted to and approved by the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives with the appropriate tax stamp attached in accordance with 26 U.S.C. § 5822 and 18 U.S.C. § 922(o), said lower receiver bearing serial number LW001804 was lawfully converted into a configuration classified as a “machinegun.”

4. Ryan S. Watson, as trustee of the Watson Family Gun Trust has authority under the trust documents and laws of the Commonwealth of Pennsylvania to act on behalf of the Watson Family Gun Trust.

5. The Watson Family Gun Trust is the lawful owner of the Defendant property, and as such demands that said property bearing serial number LW001804 that is subject to the present action be returned to its possession.

Respectfully submitted,

Dated: May 26, 2015

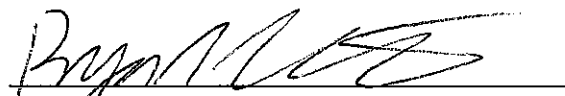
/s/ David Scott
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VERIFICATION

I, Ryan S. Watson, as trustee of the Watson Family Gun Trust, hereby declare that I have read the foregoing verified claim. Having personal knowledge of the facts of the present matter, I verify and declare that the foregoing is true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 26, 2015.



Ryan S. Watson
Trustee, Watson Family Gun Trust